

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

CHRISTOPHER BILEK, individually and on)	
behalf of others similarly situated,)	Case No. 1:19-cv-08389
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY, et al.,)	Hon. Judge Charles P. Kocoras
)	Hon. Mag. Judge Susan E. Cox
Defendants.)	
)	

MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL

Pursuant to LR 83.17, Defendant Health Insurances Innovations, Inc. (“HII”) hereby respectfully moves this Court for an order granting this motion for withdrawal and substitution of its counsel in this matter. In support of this motion, HII states as follow:

1. Timothy Hudson of Tabet DiVito Rothstein LLC and Garry O’Donnell of Greenspoon Marder LLP have appeared as counsel of record in this matter for HII. *See* Dkt. No. 7, 47, 48.

2. HII has determined to retain new counsel to replace the counsel identified in the preceding paragraph. Specifically, HII has decided to retain the following attorneys at the law firm of King & Spalding LLP:

- a. Rachael M. Trummel, King & Spalding, LLP, 110 North Wacker Drive, 38th Floor, Chicago, IL 60606; and
- b. David Balser, Zachary McEntyre, and Danielle Chattin, King & Spalding LLP, 1180 Peachtree Street, NE, Suite 1600, Atlanta, GA 30309.

3. Ms. Trummel is admitted to practice before this Court and is a member in good standing of the State Bar of Illinois.

4. Mr. Balser, Mr. McEntyre, and Ms. Chattin are each members in good standing of the State Bar of Georgia, and each will soon file a motion to appear *pro hac vice* on behalf of HII pursuant to LR 83.14. Mr. Balser will serve as lead counsel.

5. This motion is not brought for any improper purpose, and HII does not expect the requested substitution to delay this matter, including because HII's proposed new counsel are committed to getting up to speed quickly and because no trial date has been set.

6. For the avoidance of doubt, the undersigned hereby certifies that HII consents to the requested withdrawal and substitution of counsel.

WHEREFORE, Defendant Health Insurance Innovations, Inc. respectfully requests that this Court enter an Order granting this motion for withdrawal and substitution of counsel.

Dated: August 30, 2021

Respectfully submitted,

HEALTH INSURANCE INNOVATIONS, INC.

By: /s/ Rachael M. Trummel
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 30, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Rachael M. Trummel

Rachael M. Trummel

*Attorney for Defendant Health Insurance
Innovations Inc.*